



July 3, 2019

**Via Electronic Filing**

Hon. Douglas E. Arpert, USMJ  
United States District Court - Trenton  
Clarkson S. Fisher Fed. Bldg.  
402 East State Street  
Trenton, NJ 08608

**Re: Haley Schuler v. Monmouth Vocational School District  
3:19-cv-00025-BRM-DEA**

Dear Your Honor:

As Your Honor is aware, I represent the Plaintiff in the above-captioned matter. Though counsel's brief was due on June 10, 2019, per the Court's briefing schedule, I do not object to counsel's request for an extension. I respectfully wish to make two corrections based on what counsel has represented in his letter. First, counsel and I only discussed an extension of July 1, 2019. (See Annex "A."). Second, counsel incorrectly states that it was the "fault of Plaintiff" that he did not see the electronic filing. The filing generates an automatic notice, which lists the email addresses of the parties to whom it is sent. (See Annex "B."). There was no fault on the part of Plaintiff, as counsel received notice when the brief was filed.

**PA OFFICE**

1420 Locust Street, Suite 420  
Philadelphia, PA 19102

T/F: 215-650-7563

**NJ OFFICE**

Historic Smithville, Suite 1  
1 N. New York Road  
Galloway, NJ 08205

T: 856-282-5550



Montgomery Law, LLC  
Lawyers You Love

Please do not hesitate to be in touch should You Honor have any further questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BF', is positioned above the printed name.

Bradley R. Flynn, Esq.  
For Montgomery Law

Cc: Mr. Michael Pattanite, Esq.  
Encl.

Annex "A."



Bradley Flynn <bradley@ed-law.com>

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## Schuler

2 messages

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**Michael Pattanite** <mpattanite@lenoxlaw.com>  
To: Bradley Flynn <bradley@ed-law.com>

Wed, Jun 26, 2019 at 3:28 PM

Brad

I just saw the opposition to Schuler, I did not receive the electronic filing notification for some reason. Do you consent to me filing a reply brief by July 1, 2019?

Please let me know so I can write to the Court.

Thanks!

Mike

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**Michael A. Pattanite, Jr., Esquire**  
*Partner*



136 Franklin Corner Road • Lawrenceville • New Jersey • 08648

P: 609 896 2000 Ext. 130

F: 609 895 1693

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**Bradley Flynn** <bradley@ed-law.com>  
To: Michael Pattanite <mpattanite@lenoxlaw.com>

Thu, Jun 27, 2019 at 7:57 AM

Hey, Mike:

Sorry you didn't see the notice. I checked, and it generated on my end. Nonetheless, I am fine with you sending a letter to request the extension. The only thing I ask is that we exclude exhibits/references to exhibits in the reply, per the rules. Otherwise, I am on board with your request.

Also, we should set up a time for a quick call on this matter to discuss resolution. I should have some time next week, before the holiday.

Best,  
Bradley

Sent from my iPhone

On Jun 26, 2019, at 3:28 PM, Michael Pattanite <mpattanite@lenoxlaw.com> wrote:

Brad

I just saw the opposition to Schuler, I did not receive the electronic filing notification for some reason. Do you consent to me filing a reply brief by July 1, 2019?

Please let me know so I can write to the Court.

Thanks!

Annex "B."



Bradley Flynn <bradley@ed-law.com>

## Activity in Case 3:19-cv-00025-BRM-DEA SCHULER v. MONMOUTH COUNTY VOCATIONAL SCHOOL Brief in Opposition to Motion

1 message

njdefiling@njdc.uscourts.gov <njdefiling@njdc.uscourts.gov>  
To: njdefiling@njdc.uscourts.gov

Mon, Jun 3, 2019 at 7:56 PM

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

District of New Jersey [LIVE]

### Notice of Electronic Filing

The following transaction was entered by MONTGOMERY, JOSEPH on 6/3/2019 at 7:56 PM EDT and filed on 6/3/2019

**Case Name:** SCHULER v. MONMOUTH COUNTY VOCATIONAL SCHOOL  
**Case Number:** [3:19-cv-00025-BRM-DEA](#)  
**Filer:** MICHAEL SCHULER  
**Document Number:** 11

#### Docket Text:

**BRIEF in Opposition filed by MICHAEL SCHULER re [10] First MOTION to Dismiss for failure to state a claim (Attachments: # (1) Certification, # (2) Text of Proposed Order) (MONTGOMERY, JOSEPH)**

**3:19-cv-00025-BRM-DEA Notice has been electronically mailed to:**

JOSEPH W. MONTGOMERY &nbsp; &nbsp; [joe@ed-law.com](mailto:joe@ed-law.com), [aps@ed-law.com](mailto:aps@ed-law.com), [bradley@ed-law.com](mailto:bradley@ed-law.com),  
[joe@philalaw.org](mailto:joe@philalaw.org), [zach@ed-law.com](mailto:zach@ed-law.com)

PATRICK F. CARRIGG &nbsp; &nbsp; [pcarrigg@lenoxlaw.com](mailto:pcarrigg@lenoxlaw.com)

**3:19-cv-00025-BRM-DEA Notice has been sent by regular U.S. Mail:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1046708974 [Date=6/3/2019] [FileNumber=12624830-0